



**ST HELENS BOROUGH LOCAL PLAN 2020-2035
EXAMINATION**

HEARING SESSION 5

**MATTER 4 – HOUSING AND EMPLOYMENT
ALLOCATIONS AND SAFEGUARDED LAND**

RAINFORD, BILLINGE, GARSWOOD AND HAYDOCK

**ON BEHALF OF REDROW HOMES NORTH WEST &
WALLACE LAND INVESTMENTS**

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1. INTRODUCTION

- 1.1 Pegasus Group has been instructed on behalf of their clients, Redrow Homes North West and Wallace Land Investments, to prepare Hearing Statements to the St Helens Local Plan Examination (EiP).
- 1.2 This Statement deals with **Hearing Session 5 Matter 4**, which addresses '**Allocations, Safeguarded Land and Green Belt boundaries in Rainford, Billinge, Garswood and Haydock**'. We have prepared separate Hearing Statements to deal with the remaining allocations and safeguarded land sites which are to be discussed at Hearing Sessions 4 & 6.
- 1.3 At the outset we note that the Council published an updated 'Employment And Housing Land Supply Position as of 31st March 2021' (**SHBC007**) on 12th May 2021, which extends the plan period to 2037 as the Council suggest they would do as a Main Modification in their responses to PQ24 and PQ25 and which we endorse.
- 1.4 Accordingly, this statement is based on this latest evidence and extended plan period; however we note that this post-dates, and therefore does not align with, the Inspectors questions. It has also given representors just 8 working days to respond, given the 21st May deadline for Matter 4 Statements.

2. ISSUE 1: LAND TO THE WEST OF SANDWASH CLOSE, RAINFORD (9EA) AND LAND SOUTH OF HIGHER LANE, RAINFORD (8HA)

Question 1 - Do the Green Belt assessments support the allocation of Site 8HA and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

Question 2 - If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

- 2.1 The Council have demonstrated that exceptional circumstances are present to justify alterations to Green Belt boundaries at a boroughwide level (as addressed in question 4 of our Matter 3 Statement); however Policy LPA05 fails to explain why exceptional circumstances exist to support specific allocations, including site 8HA.

Question 3 - Is the configuration and scale of allocation 8HA justified taking into account development needs and the Green Belt assessments?

- 2.2 No comment.

Question 4 - Would the adverse impacts of developing Site 8HA (Green Belt impacts, highway safety, proximity to industrial development) outweigh the benefits?

- 2.3 As highlighted in our site proforma for allocation 8HA, contained at **Appendix 1**, the site scores comparatively poorly in both the Council's Sustainability Appraisal (SA) scoring and our SA scoring of the site. Indeed, using the score ranking system that we devised¹, only two sites scored lower than 8HA in terms of Sustainability Appraisal scoring. The SA's scored the site down in terms of the loss of high-quality agricultural land and other matters such as landscape sensitivity.

- 2.4 So regardless of whether the benefits of this site outweigh the impacts, in comparative terms it has not been clearly demonstrated that this site is more suitable for allocation than other omission sites, including the Redrow North West site at Burrows Lane Eccleston, and the Wallace site at Mill Lane, Rainhill.

Question 5 - Is Site 9EA justified taking into account vacant land/units nearby on Rainford Industrial Estate?

- 2.5 No comment.

Question 6 - Can a safe and suitable access be achieved to Sites 9EA and 8HA?

- 2.6 No comment.

Question 7 - Are the requirements for Sites 9EA and 8HA within Appendix 5 (Site Profile) positively prepared and effective?

- 2.7 No comment.

¹ See page 1 of Appendix 1 for comparative SA scoring of all allocations and safeguarded land sites

Question 8 - Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1 and 4.5 justified and effective?

2.8 No comment.

Question 9 - Will infrastructure to support the allocations be delivered at the right time and in the right place?

2.9 No comment.

Question 10 - Are there any barriers to Site 8HA coming forward as anticipated by the housing trajectory?

2.10 No comment.

3. ISSUE 2: LAND TO THE SOUTH OF BILLINGE ROAD, GARSWOOD (1HA) AND LAND TO THE SOUTH OF LEYLAND GREEN, GARSWOOD (1HS)

Question 11 - Do the Green Belt assessments support the allocation of Site 1HA and the safeguarding of Site 1HS and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

3.1 We refer to our answer to question 2 in respect of exceptional circumstances. We have no detailed comments to make on Green Belt matters for these sites, other than to note that site 1HS scores medium in Green Belt terms. Therefore, it has again not been clearly demonstrated that this site is more suitable for safeguarding than other omission sites, including the Redrow North West site at Burrows Lane Eccleston, and the Wallace site at Mill Lane, Rainhill.

Question 12 – If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

3.2 Please see earlier response to question 2.

Question 13 - Is the configuration and scale of allocation 1HA justified taking into account development needs and the Green Belt assessments?

3.3 No comment.

Question 14 - Would the adverse impacts of developing Site 1HA (Green Belt impacts, highway safety) outweigh the benefits?

3.4 No comment.

Question 15 - Are the requirements for Sites 1HA and 1HS within Appendices 5 and 7 (Site Profiles) positively prepared and effective?

3.5 No comment.

Question 16 - Are the indicative site areas, net developable areas, minimum densities and indicative site capacities within Tables 4.5 and 4.8 justified and effective?

3.6 We have some potential concerns about the deliverability of site 1HS, which in turn leads to concerns regarding its indicative site capacity. Land Registry details indicate that the private landowner is not affiliated with a housebuilder or land promoter. Given the site has been proposed as safeguarded land since 2016, which could be released earlier for housing development as part of an emerging Local Plan review, there are potential concerns regarding the commercial desirability of the site. This is pertinent because there are several omission sites that were safeguarded sites in 2016, including the Redrow site at Burrows Lane Eccleston, and the Wallace site at Mill Lane, Rainhill which have developers/specialist land promoters confirmed and can be brought forward immediately on the basis of their demonstrable suitability and availability.

3.7 The SA also confirms the presence of 7 mine shafts on the site, as highlighted in the detailed site proformas contained at **Appendix 1**. It seems likely that this will reduce the developable area

below 75%, bringing into question whether the indicative site capacity of 291 dwellings is realistic, and we would ask that the Council provide further clarification on this matter.

- 3.8 Finally, the site also scores the second worst of all proposed safeguarded sites in the Council's SA Addendum (see summary table at **Appendix 1**). We therefore question the deliverability and overall suitability of this site and whether it is a justified safeguarded land site.

Question 17 - Will infrastructure to support the allocations be delivered at the right time and in the right place?

- 3.9 No comment.

Question 18 - Are there any barriers to Site 1HA coming forward as anticipated by the housing trajectory?

- 3.10 No comment.

4. ISSUE 3: FLORIDA FARM NORTH (2EA), LAND NORTH OF PENNY LANE (3EA). LAND SOUTH OF PENNY LANE (4EA), LAND TO THE WEST OF HAYDOCK INDUSTRIAL ESTATE (5EA), LAND WEST OF MILLFIELD LANE, HAYDOCK (6EA), LAND AT FLORIDA FARM, HAYDOCK (2HA), AND LAND NORTH-EAST OF JUNCTION 23 (M6), HAYDOCK (2ES)

Question 19 - Does the Plan reflect the current status of Florida Farm North (2EA) and land north of Penny Lane (3EA) (completed sites)?

4.1 No comment.

Question 20 - Do the Green Belt assessments support the allocation of Sites 4EA, 5EA and 6EA and Site 2HA and the safeguarding of Site 2ES and demonstrate exceptional circumstances for the removal of the land from the Green Belt?

4.2 No comment.

Question 21 - If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

4.3 No comment.

Question 22 - Should Site 2ES be allocated rather than safeguarded so that it can contribute to meeting needs in the Plan period?

4.4 No comment.

Question 23 - Is the configuration and scale of the allocations and safeguarded land justified taking into account development needs and the Green Belt assessments?

4.5 No comment.

Question 24 - Would the adverse impacts of developing Sites 4EA, 5EA and 6EA and Site 2HA (Green Belt impacts, landscape impacts, highway safety, flood risk, agricultural land, air quality) outweigh the benefits?

4.6 No comment.

Question 25 - Are the requirements for Sites 4EA, 5EA, 6EA, 2HA and 2ES within Policies LPA04.1 and LPA05.1 and Appendices 5 and 7 (Site Profiles) positively prepared and effective?

4.7 No comment.

Question 26 - How should the requirements for Sites 5EA and 6EA be modified to provide clarity on access arrangements?

4.8 No comment.

Question 27 - Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities within Tables 4.1, 4.5 and 4.8 justified and effective?

- 4.9 In relation to site 2HA, given the presence of the A580 East Lancashire Road to the north, it is likely that a development setback will be required to alleviate concerns about noise. There are also small areas of flood zone 2 which may also reduce overall site capacity and the indicative site capacity currently suggested (522 no. dwellings). We would ask that the Council provide further justification on this matter.

Question 28 - Will infrastructure to support the allocations, including improvements to Junction 23 (M6), be delivered at the right time and in the right place?

- 4.10 No comment.

Question 29 - Are there any barriers to Site 2HA coming forward as anticipated by the housing trajectory?

- 4.11 No comment.

5. ISSUE 4: OTHER GREEN BELT BOUNDARIES

Question 30 - Are the Green Belt boundaries elsewhere in Rainford, Garswood, Billinge and Haydock justified?

5.1 No comment.

APPENDIX 1- SITE PROFORMAS FOR PROPOSED ALLOCATIONS AND SAFEGUARDED SITES

Please see attached as Appendix 1 of our Matter 4 Session 4 Statement (Ref: R010).